



Anthony M. Juliano  
Direct Dial: 973-403-3154  
Direct Fax: 973-618-5554  
E-mail: [ajuliano@bracheichler.com](mailto:ajuliano@bracheichler.com)

July 23, 2024

***VIA ECF***

Magistrate Peggy Kuo, U.S.M.J.  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

**Re: State Farm Mut. Auto. Ins. Co., et al. v. Metro Pain Specialists P.C., et al.**  
**Case No.: 1:21-cv-05523-MKB-PK**

Dear Magistrate Kuo:

As Your Honor may recall, this firm represents defendants Yan Moshe, Hackensack Specialty ASC LLC, Integrated Specialty ASC LLC, Reuven Alon, Columbus Imaging Center LLC, Medaid Radiology LLC, SCOB LLC, Citimed Surgery Center LLC, NJMHMC LLC, Star Solutions Services, LLC, Beshert Corp., Nizar Kifaieh, M.D., and Premier Anesthesia Associates PA (collectively "Defendants") in the above referenced matter. I am writing in response to Your Honor's July 11, 2024 directive regarding Defendants' ESI production.

After discussing Defendants' ESI production status and remaining items to review with counsel for State Farm Mutual Automobile Insurance Company and State Farm Fire and Casualty Company ("Plaintiffs"), the parties request Your Honor review and approve the following deadlines:

- Defendants Reuven Alon and Beshert Corp. are to provide a certification stating which e-mail accounts are accessible and which are not on or before August 20, 2024;
- Defendants' ESI production to be completed on or before September 15, 2024;
- Defendants to provide a privilege log related to ESI production on or before September 30, 2024.

5 Penn Plaza, 23rd Floor  
New York, New York 10001  
212.896.3974

101 Eisenhower Parkway  
Roseland, New Jersey 07068  
973.228.5700

515 N. Flagler Drive  
Suite P-300  
West Palm Beach, Florida 33401  
561.899.0177

[www.bracheichler.com](http://www.bracheichler.com)

Magistrate Peggy Kuo, U.S.M.J.  
July 23, 2024  
Page 2

Thank you for Your Honor's consideration.

Respectfully submitted,

*/s/ Anthony M. Juliano*

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